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16 UNITED STATES OF AMERICA

17 UNITED STATES DISTRICT COURT

18 FOR THE CENTRAL DISTRICT OF CALIFORNIA

19 UNITED STATES OF AMERICA,

No. 2:25-mj-03506-DUTY

20 Plaintiff,

MOTION TO DISMISS COMPLAINT
WITHOUT PREJUDICE AGAINST
DEFENDANT PURSUANT TO FEDERAL RULE
OF CRIMINAL PROCEDURE 48(a)

21 v.

22 JOSE MANUEL MOJICA,

23 Defendant.

24 The United States Attorney for the Central District of
25 California hereby requests leave of the Court to dismiss the
26 complaint against defendant Jose Manuel Mojica without prejudice.

27 The government's request for dismissal is made in good faith
28 and in the interest of justice. The law "generally require[s] a
district court to defer to the government's decision to seek a
dismissal of a criminal charge" under Rule 48(a) motions when they
are not opposed by the defense. United States v. Gonzalez, 58 F.3d
459, 462 (9th Cir. 1995).

Accordingly, the government requests that the Court grant this motion to dismiss the complaint without prejudice against defendant Jose Manuel Mojica pursuant to Federal Rule of Criminal Procedure 48(a). The government further requests that defendant Jose Manuel Mojica's bond be exonerated, and that any terms and conditions of pretrial release be terminated.

Dated: June 18, 2025

Respectfully submitted,

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/s/

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